

**From:** Philip Wang <pwang@raklaw.com>  
**Sent:** Monday, February 10, 2025 1:46 PM  
**To:** Jared Hartzman  
**Cc:** Thad Kodish; [SERVICE FR] Samsung-Headwater; melissa@gillamsmithlaw.com; kdavis@raklaw.com; jwietholter@raklaw.com; rak\_headwater@raklaw.com; Andrea Fair  
**Subject:** Re: Headwater v Samsung (EDTX) (641): Meet & Confer Request

Jared,

Your comments are unsupported and unnecessary in discussing a simple briefing adjustment. I note that we're well before the close of discovery in the -641 case and claim construction briefing hasn't started. Further, Headwater cooperated with Samsung multiple times in scheduling adjustments (including trial) in the -422 and -103 cases.

That said, we're fine with adjusting Samsung's reply deadline as you request. We also don't intend in our opp to rely on new depositions that occur after Feb. 11st. We'll file our unopposed motion with that understanding.

Thanks,

Philip

Philip Wang  
Russ August & Kabat  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025  
310 826-7474  
pwang@raklaw.com

On Feb 10, 2025, at 6:24 AM, Jared Hartzman <hartzman@fr.com> wrote:

Philip,

While we have serious doubts that Headwater's request is supported by good cause (given Headwater has apparently spent the time it should have been responding to our Sanctions Motion in the -641 case drafting a baseless motion relating to long-over and already addressed discovery disputes in the -103 case), Samsung can agree not to oppose Headwater's requested extension provided two conditions are met:

(1) Samsung will receive a reciprocal one week extension for its Reply (from February 25<sup>th</sup> to March 4<sup>th</sup>); and

(2) Headwater's Opposition will not discuss or cite to any events that arise, at deposition or otherwise, after February 11, the original due date for Headwater's opposition.

Please confirm.

Regards,

**Jared Hartzman** :: Principal :: Fish & Richardson P.C.  
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**From:** Philip Wang <[pwang@raklaw.com](mailto:pwang@raklaw.com)>  
**Sent:** Saturday, February 8, 2025 6:50 PM  
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**Subject:** Re: Headwater v Samsung (EDTX) (641): Meet & Confer Request

[This email originated outside of F&R.]

Thad,

I write regarding Samsung's motion for sanctions (Dkt. 59) in the -641 case.

Headwater requests a one-week extension to file its opposition, from Feb. 11th to Feb. 18th. The request is supported by good cause, including intervening scheduling conflicts and travel.

Could you please confirm that Samsung doesn't oppose?

Thanks,

Philip

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